

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE: **JOSE LUIS CORREA GONZALEZ**  
SSN xxx-xx-3630

CASE NO: **19-01722-MCF**

Debtor(s)

**Chapter 13**

**TRUSTEE'S OBJECTION TO PROPOSED POST CONFIRMATION PLAN MODIFICATION UNDER SECTION 1329**

\*ATTORNEY FEES AS PER R 2016(b) STATEMENT:

Attorney of Record: **RAMON F LOPEZ LAW OFFICE\***

Total Agreed: **\$3,000.00**      Paid Pre-Petition: **\$475.00**      Outstanding (Through the Plan): **\$0.00**

\*TRUSTEE'S POSITION RE CONFIRMATION UNDER U.S.C. §1329

Debtor's/s' Commitment Period: ☐ Under Median Income 36 months ☒ Above Median Income 60 months §1325(b)(1)(B)  
Projected Disposable Income: **\$0.00**

**Liquidation Value:\$0.00      Estimated Priority Debt: \$52,299.61**

**If the estate were liquidated under Chapter 7, nonpriority unsecured claims would be paid approximately \$0.00**

With respect to the Proposed "PCM": Dated **08/17/2020 (Dkt 53)**      **Plan Base: \$69825**

**The Trustee:** ☐ **DOES NOT OBJECT** ☒ **OBJECTS** Plan Confirmation      Gen. Uns. Approx. Dist.:%

**The Trustee objects to confirmation for the following reasons:**

**[1325(a)(6)] Insufficiently Funded – Plan funding insufficient to pay 100% of [507] priority claims. [1322(d)(1)]**

Debtor has an issue in relation to ASUME. Until this issue resolved the Trustee cannot approved the plan.

As per 11 USC 1322 (a)(2) the plan:

"shall provide for the full payment, in deferred cash payments, of all claims entitled to priority under section 507 of this title, unless the holder of a particular claim agrees to a different treatment of such claim"

Certificate from ASUME should be submitted in order to determine the amount owed to creditor.

**\*OTHER COMMENTS / OBJECTIONS**

**NONE.**

**NOTICE**

**14 day notice:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

/s/ Jose R. Carrion, Esq.  
**CHAPTER 13 TRUSTEE**  
PO Box 9023884, San Juan PR 00902-3884  
Tel. (787)977-3535 Fax (787)977-3550

Date: September 09, 2020

/s/ Juliel Perez, Esq.